

IN THE UNITED STATE DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION

MONICA DANIEL HUTCHISON,)	
)	
Plaintiff,)	
)	Case No.: 09-3018-CV-S-RED
vs.)	
)	<u>Jury Trial Demanded</u>
TEXAS COUNTY, MISSOURI;)	
MICHAEL R. ANDERSON,)	
TEXAS COUNTY PROSECUTING)	
ATTORNEY; and)	
MICHAEL R. ANDERSON, individually)	
)	
Defendants.)	

PLAINTIFF MONICA DANIEL HUTCHISON'S EXHIBIT LIST

COMES NOW Plaintiff Monica Daniel Hutchison, by and through counsel, and designates the following exhibits which she may use during the cross-examination of Defendant's witnesses during her case in chief:

<u>Plaintiff's Exhibit No.</u>	<u>Description of Exhibit</u>
1	Lt. Melissa Dunn's report, 4 pgs.
2	Haywood Jablome note, 1 pg.
3	Criminal investigative subpoena signed by Judge Ellsworth, 1 pg.
4	Def. Anderson's Jan. 8, 2005 letter to Plaintiff, 2 pgs.
5	Def. Anderson's Dec. 20, 2005 email to Plaintiff, 2 pgs.
6	Def. Anderson's May 16, 2006 letter to Emde, 3 pgs.
7	Def. Anderson's Jan. 21, 2006 letter to MO Attorney General's office, 3 pgs.
8	Certified records of the MO Attorney General's office pursuant to subpoena, 20 pgs.
9	Notice of EEOC Complaint, 1 pg.
10	Calendar of November and December 2005 & January of 2006, 3 pgs.
11	Timeline of Plaintiff's employment, 1 pg.
12	Affidavit of Terry Haden, 1 pg.
13	Affidavit of Stephanie Creek Pounds, 1 pg.
14	Affidavit of Christina Norma Rose Mosley, 2 pgs.

15	Newspaper article of date rape drug, 1 pg.
16	Certified records of the Houston Herald, 20 pgs.
17	Anderson's Complaint filed May 31, 2006, 3 pgs.
18	Dr. Pribor's report, 33 pgs.
19	Anderson's notes on his first meeting with Plaintiff, 3 pgs.
20	Records of the EEOC, 202 pgs.
21	Dr. Pribor's invoices, 5 pgs.
22	Affidavit of Officer Mike Hood, 2 pgs.
23	EEOC notes on phone interviews with Def. Anderson, 10 pgs.
24	McCabe test results and report, 50 pgs.
25	KY3 News blog dated May 24, 2006
26	Complete file Williams v. Anderson, Case No. CV8-06-224-DR, 14 pgs.
27	Complete file Anderson v. Daniel & Williams, Case No. CV8-06-221-CC, 18 pgs.
28	Transcript 1 of Def. Anderson's cell phone calls to the home of Plaintiff, 1 pg.
29	Transcript 2 of Def. Anderson's cell phone calls to the home of Plaintiff, 1 pg.
30	Transcript 3 of Def. Anderson's cell phone calls to the home of Plaintiff, 1 pg.
31	Def. Anderson's Aug. 9, 2005 letter to the Texas Co. Commission regarding salary increase for Plaintiff, 1 pg.
32	Accident report and reconstruction report from the Sullins accident, 34 pgs.
33	Def. Anderson's answers to Plfs. 1 st Interrogatories, 76 pgs.
34	Def. Anderson's answers to Plfs. 2 nd Interrogatories, 15 pgs.
35	Texas Co.'s answers to Plfs. 1 st Interrogatories, 6 pgs.
36	Texas Co.'s answers to Plfs. 2 nd Interrogatories, 3 pgs.
37	Texas Co.'s payroll records of the Office of the Prosecuting Attorney, 1 pg.
38	Texas Co.'s answers to Plfs. Request for Admissions, 5 pgs.
39	Dr. Halfaker's report and file, 170 pgs.
40	Determination letter from EEOC dated June 28, 2007, 2 pgs.
41	Dina Vitoux's report, 3 pgs.
42	Dina Vitoux's C.V., 6 pgs.
43	Dina Vitoux's medical records of Plaintiff, 6 pgs.
44	Rule 26(a) Disclosures of Def. Anderson, 5 pgs.
45	Plfs. letter to EEOC dated Feb. 1, 2006 – version 1,

2 pgs.

46 Plfs. letter to EEOC dated Feb. 1, 2006 – long version,
5 pgs.

47 Picture of lewd trash thrown in Plaintiff's yard

48 Picture of Plf. and co-workers at a restaurant while
working for the Texas Co. Prosecutor's office

49 CD of Def. Anderson's phone calls that was sent to
Warren Harris for approval

50 CD of Def. Anderson's phone calls given to Dr. Pribor

51 The cassette tape of Def. Anderson's phone calls to Plf.

52 Def. Anderson's Phineas Gold phone call/message

53 Casenet docket sheet on Phineas Gold, 7 pgs.

54 Def. Anderson's email to Topix, 1 pg.

55 EEOC Right to Sue letter to Plaintiff dated
Oct. 23, 2008, 1 pg.

56 Def. Anderson's letter to Marci Mosley dated
Aug. 3, 2006, 1 pg.

57 Order signed by Judge Ellsworth taking Millie
Williams off of small claims cases, 1 pg.

58 MO Revised Statutes Chapter 56 Section 56.110, 1 pg.

59 Case log from EEOC files, 4 pgs.

60 Def. Anderson's letter to Emde dated May 4, 2006,
2 pgs.

61 EEOC letter to Def. Anderson dated April 20, 2006,
1 pg.

62 Judge Ellsworth's card to Millie Williams, 2 pgs.

63 Original recordings made by Christina Mosley of her
conversation with Plf.

64 Excerpt of recordings made by Christina Mosley
(deposition exhibit 33 identified in the deposition of
Christina Mosley)

65 Excerpt of recordings made by Christina Mosley
(deposition exhibit 34 identified in the deposition of
Christina Mosley)

66 Excerpt of recordings made by Christina Mosley
(deposition exhibit 35 identified in the deposition of
Christina Mosley)

67 Excerpt of recordings made by Christina Mosley
(deposition exhibit 36 identified in the deposition of
Christina Mosley)

68 Print out of the value of Def. Anderson's county
retirement, 2 pgs.

69 American Psychiatric Association (2000) Diagnostic
and Statistical Manual of Mental Disorders, Fourth
Edition, Text Revision; APA; Washington, D.C.

70 Briere, John (2004) Psychological Assessment of Adult
Posttraumatic States: Phenomenology, Diagnosis, and
Measurement, Second Edition; American Psychological
71 Association; Washington, D.C.
Gold, Liza (2004) Sexual Harassment: Psychiatric
Assessment in Employment Litigation; American
Psychiatric Association; Washington, D.C.
72 Simon, Robert (2003) Posttraumatic Stress Disorder in
Litigation: Guidelines for Forensic Assessment;
American Psychiatric Association; Washington, D.C.
73 Second Supplemental Rule 26(a) Disclosures of Def.
Anderson, 4 pgs.

Respectfully Submitted,

STEELMAN, GAUNT & HORSEFIELD

By: /s/ Stephen F. Gaunt
MO Bar #33183
David L. Steelman, MO Bar #27334
901 Pine Street, Ste. 110
P.O. Box 1257
Rolla, MO 65402
Telephone: 573-341-8336
Fax: 573-341-8548
dsteelman@steelmanandgaunt.com
sgaunt@steelmanandgaunt.com

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I, Stephen F. Gaunt, hereby certify that on the 29th day of November, 2010 the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to:

Warren E. Harris
Taylor, Stafford, Clithero, Fitzgerald & Harris, LLP
3315 East Ridgeview, Ste. 1000
Springfield, MO 65804
Counsel for Defendant Michael Anderson

/s/ Stephen F. Gaunt
Stephen F. Gaunt